

# **Exhibit 7**

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
3 IN RE: TERRORIST )  
4 ATTACKS ON ) 03-MDL-1570  
5 SEPTEMBER 11, 2001 ) (GBD)(SN)  
6 \_\_\_\_\_ )

7 TUESDAY, JUNE 22, 2021

8 THIS TRANSCRIPT CONTAINS  
9 CONFIDENTIAL MATERIAL

10 - - -

11 Remote videotaped deposition of  
12 Samuel G. Coombs, held at the location of the  
13 witness in Alabama, commencing at 11:33 a.m.  
14 Central Time, on the above date, before  
15 Carrie A. Campbell, Registered Diplomat  
16 Reporter, Certified Realtime Reporter,  
17 Shorthand Reporter, Certified Court  
18 Reporter.

19 - - -

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23  
24  
25

<p style="text-align: right;">Page 74</p> <p>1 that show where we were meeting and at what 2 time.</p> <p>3 Q. Okay. Do you have any hardcopy 4 documents exchanged with the Kreindler &amp; 5 Kreindler firm?</p> <p>6 A. They made copies of my business 7 cards. They made copies of front pages of my 8 passport, and that was it. To show the 9 cover -- that was it.</p> <p>10 Q. In your meetings with Ken -- in 11 your meetings with Ken Williams, did you 12 retain any hardcopy documents? Any notes, 13 any papers, anything he provided to you?</p> <p>14 A. No.</p> <p>15 Q. Now, for Request Number 2, did 16 you search for all documents relating to any 17 declarations that you have signed related to 18 the actions, including, but not limited to, 19 any drafts, outlines or summaries of such 20 declarations?</p> <p>21 A. I went online and looked at the 22 9/11 Commission statement, and that was all I 23 looked at, referencing my name in that 9/11 24 Commission outline.</p> <p>25 I just looked at it online. I</p>	<p style="text-align: right;">Page 76</p> <p>1 at 1:02 p.m. 2 (Off the record at 1:02 p.m.)</p> <p>3 VIDEOGRAPHER: Back on the 4 record at 1:19 p.m.</p> <p>5 MR. DORRIS: Good news for you, 6 Mr. Coombs. I have no further 7 questions. Thank you for your time.</p> <p>8 CROSS-EXAMINATION 9 QUESTIONS BY MR. KRY:</p> <p>10 Q. Mr. Coombs, my name is Robert 11 Kry. I'm one of the lawyers that represents 12 Dallah Avco in this case, and so I have some 13 questions for you as well.</p> <p>14 If we could put back up on the 15 screen your declaration, which was previously 16 marked Exhibit 810.</p> <p>17 In the second paragraph, you 18 state, "I first applied to work at Dallah 19 Avco in 1983 and began working for them in 20 Jeddah, Saudi Arabia, in 1983 as a chief 21 procurement officer at the King Khalid 22 Military City."</p> <p>23 Mr. Coombs, how long did you 24 work at the King Khalid Military City?</p> <p>25 A. I was only up there until --</p>
<p style="text-align: right;">Page 75</p> <p>1 did not print it. Shut it back down because 2 it didn't cover enough information.</p> <p>3 Q. Do you have any copies --</p> <p>4 A. That was the only research --</p> <p>5 Q. Sorry. Sorry to interrupt.</p> <p>6 Do you have any copies of any 7 drafts, outlines or summaries of the 8 declaration that you prepared?</p> <p>9 A. No.</p> <p>10 Q. Do you -- when you met with Ken 11 Williams, did you jot down any notes on a 12 notepad and keep those?</p> <p>13 A. No.</p> <p>14 MR. DORRIS: We've been going 15 for about an hour and a half. I think 16 now is a good time for a quick break.</p> <p>17 And just for your -- for 18 everybody's benefit, I may have a few 19 additional questions, but I don't 20 anticipate going much longer.</p> <p>21 MR. KRY: Just to be clear, 22 we'll have some pretty extensive 23 questions after Dan's done on behalf 24 of Dallah Avco.</p> <p>25 VIDEOGRAPHER: Off the record</p>	<p style="text-align: right;">Page 77</p> <p>1 about ten months. I got it set up and 2 everything, and they turned it over to a guy 3 from the US Army Corp of Engineers. And I 4 had trained everybody, wrote out all their 5 initial procedures and everything, got it set 6 up, and I came back -- and came back to the 7 States.</p> <p>8 Q. And did that job relate to 9 Civil Aviation in any way?</p> <p>10 A. No, that -- that was -- it was 11 King Khalid Military City. It was a base up 12 there by Hafar Al-Batin. It was a military 13 base that they launched out into Iraq. It 14 had tanks. It had Air Force. It had 15 everything. And basically, I was helping 16 them finalize the support element.</p> <p>17 Q. Are you sure that that --</p> <p>18 A. Go ahead.</p> <p>19 Q. Are you sure that that position 20 was with Dallah Avco as opposed to a 21 different company within the broader Dallah 22 group of companies?</p> <p>23 A. No. It was Dallah Avco out of 24 Houston, Texas, and then I went to -- to 25 Dallah. I lived -- I was paid by Dallah in</p>

<p style="text-align: right;">Page 78</p> <p>1 Jeddah. Sheik Saleh Kamel, the originator, 2 was still there. 3 I went from there, as a part of 4 the initial team, into Hafar Al-Batin because 5 they had hired me to set things up. I was 6 the chief of procurement for about ten 7 months. I got everything set up, and then 8 the contract that they offered me after that 9 was considerably less, and so I came back 10 home. 11 Q. You referred in your answer to 12 Dallah Avco out of Houston, Texas. 13 Are you referring to Avco 14 Overseas? 15 A. Yeah. Yeah. 16 Q. Do you know whether Avco 17 Overseas has a subcontractor relationship 18 with Dallah Avco or a corporate affiliate 19 relationship to Dallah Avco? 20 A. At that time it seemed to me 21 like Saleh Kamel was very close connected. 22 He was way above me in understanding that 23 portion. 24 When I came back to the States, 25 I actually out-processed in Houston.</p>	<p style="text-align: right;">Page 80</p> <p>1 within the AED." 2 Are those statements accurate? 3 A. That is totally accurate. 4 Q. Who did you submit your 5 application to? 6 A. I submitted the application to 7 Dallah. 8 Q. Who interviewed you? 9 A. I took my résumé up there. 10 Q. Who interviewed -- 11 A. They -- 12 Q. I apologize for interrupting. 13 Who interviewed you for the 14 position at the PCA? 15 MR. POUNIAN: Objection to 16 form. 17 THE WITNESS: I don't remember. 18 They just -- they just knew that they 19 needed a logistics, and I was 20 qualified. I had a -- I had a good 21 work record with them from before, and 22 basically I went in, was with them for 23 an hour, and I was hired. 24 QUESTIONS BY MR. KRY: 25 Q. Do you know whether someone at</p>
<p style="text-align: right;">Page 79</p> <p>1 Q. Did you have any firsthand 2 knowledge of the nature of the corporate 3 affiliation relationship, if any, between 4 Avco Overseas and Dallah Avco and how that 5 might have changed over the years? 6 Is that a no? 7 A. I knew there was changes -- I 8 knew there was changes going on because they 9 were visible. I didn't have any -- I didn't 10 know how it was going on inside. 11 Q. Okay. And other than that ten 12 months -- other than the ten months at King 13 Khalid Military City, did you ever work for 14 any Dallah entity between when you left King 15 Khalid and when you started work at the PCA 16 in 1994? 17 A. No. 18 Q. Further down in your 19 declaration you state, "In the summer 20 of 1994, I visited Dallah Avco and became 21 aware that Dallah Avco was recruiting for 22 positions within the Saudi Arabia Presidency 23 of Civil Aviation's Airways Engineering 24 department. I applied for and received a 25 position as assistant logistical manager</p>	<p style="text-align: right;">Page 81</p> <p>1 the PCA had to ultimately approve your 2 hiring? 3 A. No, I don't. 4 Q. In your declaration, the next 5 few sentences state, "Within a few months, my 6 immediate supervisor resigned, and I was 7 appointed manager of the logistics department 8 of AED. I stayed in this position until 9 leaving the Presidency of Civil Aviation in 10 June 1997." 11 Is that all accurate? 12 A. That is 100 percent accurate. 13 Q. What was the name of the 14 immediate superior who resigned? 15 A. I can't remember. 16 Q. Would it -- 17 A. He was retired military, and 18 that's all -- I can't remember. I'm sorry. 19 Q. That's fine. 20 Do you recognize the name A.L. 21 Jones? 22 A. Yeah, there it is. Got it. 23 Q. That was him? 24 A. Yeah. Okay. 25 Q. And was he the logistics</p>

<p style="text-align: right;">Page 82</p> <p>1 manager before you -- you took over that 2 position in 1995? 3 A. Yes. Yes. 4 Q. Do you know who took over as 5 logistics manager after you left in 1997? 6 A. Yes. Tom Wallace. 7 Q. Back to your declaration. A 8 little bit later it states, "I was paid by 9 Dallah Avco, though I had no other 10 substantial contact with Dallah Avco aside 11 from people working for the AED who were also 12 recruited by Dallah Avco. All of my 13 day-to-day duties were as manager of 14 logistics for the PCA/AED." 15 Are those statements accurate? 16 A. Accurate. 17 Q. So is it correct that you had 18 no substantial contacts with Dallah Avco, 19 other than your paycheck, while you were 20 working as logistics manager at Airways 21 Engineering? 22 A. True. 23 Q. Did anyone from Dallah Avco 24 direct or supervise your day-to-day work at 25 Airways Engineering?</p>	<p style="text-align: right;">Page 84</p> <p>1 Are those statements all 2 accurate? 3 A. That's correct. 4 Q. Was Al-Salmi in fact your boss? 5 A. Yes. 6 Q. And did Al-Salmi direct and 7 supervise your day-to-day work at Airways 8 Engineering? 9 A. He directed me -- basically he 10 would call me in and talk to me about what he 11 wanted done, and then he'd just turn me 12 loose. I was kind of independent. 13 But, yes, if something was 14 outside of the norm, I did go clear it with 15 him. 16 Q. Did Al-Salmi evaluate your job 17 performance at Airways Engineering? 18 A. Yes. 19 Q. Did Al-Salmi play a role in 20 setting your salary and benefits at Airways 21 Engineering? 22 A. I'm sure he did, because I had 23 no idea how it was done. 24 I just know that I got an 25 increment in my contract, said that I would</p>
<p style="text-align: right;">Page 83</p> <p>1 A. No way. No. 2 Q. Do you know whether the PCA 3 ultimately reimbursed Dallah Avco for the 4 salary that you received from Dallah Avco? 5 A. They -- as a part of the 6 contract that they had with Dallah, which I 7 was under, I did a timesheet every month, 8 just like everybody else did, and it 9 processed and then they paid me. 10 Q. Right. 11 So I understand that Dallah 12 Avco processed your paycheck and issued -- 13 A. Yeah. 14 Q. -- a salary to you. 15 My question is, do you know one 16 way or the other whether the PCA reimbursed 17 Dallah Avco for those salary payments? 18 A. It's a part of the contract. 19 I'm sure they did. 20 Q. Back to the declaration. The 21 next paragraph states, "My boss was Mohammed 22 Al-Salmi, AED's director general. Al-Salmi 23 approved all of my vacation and personal 24 leave as well as anything else related to my 25 job duties and administrative procedures."</p>	<p style="text-align: right;">Page 85</p> <p>1 get so much. It was in my contract. 2 Q. On the next page of your 3 declaration, there's a paragraph that says, 4 "All of PCA's offices and warehouses in 5 Jeddah were located within the same PCA 6 complex. The main AED office was located 7 directly across the street from my office at 8 the AED logistics department. I visited the 9 various AED offices as my job 10 responsibilities required me to do so." 11 Are those statements all 12 accurate? 13 A. That's correct. That's 14 correct. 15 Q. When you were a logistics 16 manager at Airways Engineering, did you work 17 in one of the Airways Engineering offices at 18 the PCA? 19 A. I was only in the logistics 20 building. I -- yes, it was one of their 21 offices, but it was the building -- I wasn't 22 in the headquarters building. I was in, 23 like, the building that had a warehouse off 24 to the side. We had offices on the end, and 25 the rest of it was warehouses.</p>

<p style="text-align: right;">Page 86</p> <p>1 Q. So I understand that building 2 is not PCA headquarters, but is it still a 3 PCA office building? 4 A. Yes. Yeah. 5 Q. Are you aware that Dallah Avco 6 had its own corporate offices, separate from 7 the PCA's Airways Engineering offices? 8 A. Yes, they had the tower just up 9 the road. 10 Q. Did you ever do any of your 11 day-to-day work for Airways Engineering from 12 Dallah Avco's corporate offices? 13 A. No. 14 Q. Okay. I'm going to put up a 15 different exhibit. This one was previously 16 marked Anqari Exhibit 369, produced at 17 KSA3168. 18 This is an organization chart 19 that the Kingdom produced in this litigation 20 for the PCA's Airways Engineering 21 directorate. And if you look at the chart, 22 there's a box at the top labeled "Director - 23 General Airways Engineering." 24 Was that the position that 25 Mohammed Al-Salmi held at the PCA?</p>	<p style="text-align: right;">Page 88</p> <p>1 Have you heard of something 2 called the Air Navigation System Support 3 project, or ANSS project? 4 A. That was something that was 5 underway, that they were structuring while I 6 was there, but I never had any details. 7 Q. Do you know whether the ANSS 8 project was the government contract under 9 which Dallah Avco provided recruiting and 10 payroll services for Airways Engineering? 11 A. No. 12 (Coombs Exhibit 815 marked for 13 identification.) 14 QUESTIONS BY MR. KRY: 15 Q. All right. I'm going to put up 16 another document. We will mark this one as 17 Exhibit 815. It's produced at DA10695. 18 This is an October 23, 1995 19 letter from Al-Salmi at Airways Engineering 20 to Magdi Hanna at Ercan, Incorporated, 21 listing some purchase requests together with 22 some attachments. 23 One of the requests listed here 24 is PR number 76224. You can see it as 25 number 9.</p>
<p style="text-align: right;">Page 87</p> <p>1 A. Yes. Yes. 2 Q. At the bottom of the chart 3 there's a box labeled "Logistics Manager." 4 Was that the unit that you 5 managed from 1995 to 1997? 6 A. Yes. 7 Q. And then at the side of the 8 chart on the right, there's a box labeled 9 "Contracts and Finance Control." 10 And do you know who managed 11 that unit in the 1995 -- 12 A. Alp Karli. Alp Karli. 13 Q. Does this chart correctly 14 reflect that as logistics manager you 15 reported to Al-Salmi? 16 A. Yes. 17 Q. And does the chart correctly 18 reflect that Alp Karli, as the head of the 19 CFC, reported to Al-Salmi? 20 A. Yes. 21 Q. A bit earlier you testified 22 that Dallah Avco recruited you to work at 23 Airways Engineering and that Dallah Avco 24 processed your payroll at Airways 25 Engineering.</p>	<p style="text-align: right;">Page 89</p> <p>1 I'm going to ask you some 2 questions about this particular purchase 3 request just to better understand the 4 logistics department's procurement process, 5 but just to be clear, I don't think there's 6 anything special about this particular 7 request. We just picked it as an example. 8 So if we can go first to the 9 attachment to this document at page 10716, 10 this is a Presidency of Civil Aviation 11 purchase requisition. At the top left, the 12 document has the requisition number, PR 13 76224, and at the top right there's a date 14 prepared of October 18, 1995. 15 And if you look at the body of 16 the requisition, there's some items listed 17 which include 10 disc drive upper heads, 10 18 disc drive lower heads, and then the next 19 page, 10 disc plotters. 20 Do you recall seeing documents 21 like this purchase requisition when you 22 worked as logistics manager? 23 A. Yes, I had to sign them. 24 Q. Would this type of document be 25 used to initiate the procurement process at</p>



<p style="text-align: right;">Page 90</p> <p>1 Airways Engineering?</p> <p>2 A. I would sign it and Al-Salmi</p> <p>3 would sign it, and then we would process it.</p> <p>4 Q. Was the purpose of this</p> <p>5 document to initiate the procurement process</p> <p>6 when Airways Engineering needed to obtain</p> <p>7 parts or other goods or services?</p> <p>8 A. Yes.</p> <p>9 Q. Who would decide what parts</p> <p>10 Airways Engineering needed to purchase</p> <p>11 through this process?</p> <p>12 A. We had a department -- we set</p> <p>13 up -- we have so many pieces of equipment,</p> <p>14 and you have to have parts for each piece of</p> <p>15 equipment. So the maintenance people would</p> <p>16 put in requests, and based on demand and</p> <p>17 turnover, we would order parts for stockage,</p> <p>18 okay, which would be a stock level. And then</p> <p>19 sometimes if it was high priority, that meant</p> <p>20 that the equipment was down, and so it would</p> <p>21 process quicker and I'd hand-carry it</p> <p>22 through.</p> <p>23 But this is normal, and this</p> <p>24 was processed through to order parts from the</p> <p>25 States for the equipment that is physically</p>	<p style="text-align: right;">Page 92</p> <p>1 Q. The individuals that would put</p> <p>2 in those requests to have these forms</p> <p>3 prepared, would those be other employees at</p> <p>4 the PCA?</p> <p>5 A. Yeah, but they were mechanics</p> <p>6 and people working in the shops and things</p> <p>7 like that.</p> <p>8 Q. Right.</p> <p>9 In the middle of the document,</p> <p>10 there's a line labeled "approved" that lists</p> <p>11 Mohammed Basharahil, yourself and Al-Salmi.</p> <p>12 Do you recognize Al-Salmi's</p> <p>13 signature on the document?</p> <p>14 A. Yes. He's to the right, I'm in</p> <p>15 the center, and Mohammed was a part of the</p> <p>16 administrative side of things on the supply</p> <p>17 side.</p> <p>18 Q. And so you recognize your</p> <p>19 signature in the middle of that document</p> <p>20 there?</p> <p>21 A. Yes, that's my signatures.</p> <p>22 Q. Do you recognize Mohammed</p> <p>23 Basharahil's signature on the left?</p> <p>24 A. Yes.</p> <p>25 Q. Was he part of the logistics</p>
<p style="text-align: right;">Page 91</p> <p>1 in Saudi Arabia. And we'd process it, they</p> <p>2 would buy it, they would ship it, then I'd</p> <p>3 get a customs clearance form pre-arrival in</p> <p>4 Saudi Arabia.</p> <p>5 Then I would take that over to</p> <p>6 the -- to Dallah because they had a customs</p> <p>7 team. And they would pick it up and deliver</p> <p>8 it to us when it arrived.</p> <p>9 Q. You referred to maintenance</p> <p>10 people that would put in requests like these.</p> <p>11 Are those maintenance people</p> <p>12 other --</p> <p>13 A. Well, they don't put them in.</p> <p>14 They put the -- it's like they're step one.</p> <p>15 They fill out a small request form, and it</p> <p>16 goes to the clerks, okay, the administrative</p> <p>17 portion of stockage, ordering spare parts.</p> <p>18 Okay. From ordering spare</p> <p>19 parts, then they look and see how many they</p> <p>20 need, and then they make a purchase order for</p> <p>21 what they need.</p> <p>22 Then they -- we process that</p> <p>23 from the administrative side of logistics,</p> <p>24 okay? We would process it for it to be</p> <p>25 ordered to the contractor.</p>	<p style="text-align: right;">Page 93</p> <p>1 department, or was he in a different PCA</p> <p>2 department?</p> <p>3 A. Oh, he was a part of the</p> <p>4 logistics department, but he would -- because</p> <p>5 he was fluent, very fluent, in several</p> <p>6 dialects of Arabic, very fluent in English</p> <p>7 and everything, he was sort of a go-between.</p> <p>8 I'd send him out to do some things, you know,</p> <p>9 I'd send him out to London. I'd send him out</p> <p>10 to, you know, other places because he was</p> <p>11 very efficient at doing it.</p> <p>12 Q. So he would report to you when</p> <p>13 you were the logistics manager?</p> <p>14 A. Yes.</p> <p>15 Q. Who would actually prepare the</p> <p>16 information that we see on this form listing</p> <p>17 the specific parts that need to be ordered?</p> <p>18 Would that be one of you in the logistics</p> <p>19 department or would it be one of the other</p> <p>20 PCA employees that submitted the request that</p> <p>21 you mentioned earlier?</p> <p>22 A. It's one of the clerks in the</p> <p>23 supply -- basically the supply office would</p> <p>24 prepare the request from a -- a handwritten</p> <p>25 request, whatever they get from the</p>

<p style="text-align: right;">Page 94</p> <p>1 mechanics.</p> <p>2 You see, if they need -- if</p> <p>3 they need a part, an electronic item, then</p> <p>4 they would -- the mechanic -- the people</p> <p>5 doing the repairs would write up a request</p> <p>6 for the part, would go to his supervisor.</p> <p>7 Then he would bring it in to Mohammed's</p> <p>8 department, the supply -- the supply</p> <p>9 department.</p> <p>10 They'd put it together, okay,</p> <p>11 identify it. Then they'd give it to me, and</p> <p>12 I'd sign off on it. Then go to Mohammed</p> <p>13 Al-Salmi, sign off on it, and then it would</p> <p>14 go to the -- to the contractor.</p> <p>15 Q. Okay. With regard to those</p> <p>16 first steps where the mechanics and the</p> <p>17 clerks would submit this information, to your</p> <p>18 knowledge, did anyone at Dallah Avco have any</p> <p>19 role in submitting that information about</p> <p>20 what parts needed to be purchased?</p> <p>21 A. No.</p> <p>22 Q. And then at the stage of the</p> <p>23 process where Al-Salmi, you and Basharahil</p> <p>24 sign off on this purchase requisition, did</p> <p>25 anyone at Dallah Avco have any role in --</p>	<p style="text-align: right;">Page 96</p> <p>1 would anyone at Dallah Avco have any role in</p> <p>2 the stage of the process where purchasing PCA</p> <p>3 logistics receives a copy of the --</p> <p>4 A. No. No.</p> <p>5 Q. Okay.</p> <p>6 A. No.</p> <p>7 Q. So we'll turn now back to the</p> <p>8 first page of the document, which is DA10695.</p> <p>9 This is the letter dated October 23, 1995,</p> <p>10 two days later, from Al-Salmi to Magdi Hanna</p> <p>11 at Ercan.</p> <p>12 It states, "Enclosed please</p> <p>13 find the following purchase requests for</p> <p>14 procurement action" against the indicated</p> <p>15 document numbers. One of those is PR 76224,</p> <p>16 the one for the disc drive components we were</p> <p>17 just looking at.</p> <p>18 Do you recognize Al-Salmi's</p> <p>19 signature on this document?</p> <p>20 A. Yes, absolutely.</p> <p>21 Q. Next to --</p> <p>22 A. Guess what?</p> <p>23 Q. Next to --</p> <p>24 A. Look down at the lower right</p> <p>25 hand. I mean, left hand --</p>
<p style="text-align: right;">Page 95</p> <p>1 A. No, not -- no.</p> <p>2 Q. Okay. At the bottom right</p> <p>3 there's a stamp that says, "Received,</p> <p>4 purchasing PCA logistics" dated October 21,</p> <p>5 1995, which is three days after the purchase</p> <p>6 requisition was dated.</p> <p>7 Does that stamp indicate that</p> <p>8 the requisition was sent to PCA -- excuse me,</p> <p>9 purchasing PCA logistics after you and</p> <p>10 Al-Salmi approved it?</p> <p>11 A. Yes.</p> <p>12 Q. Is the purchasing PCA logistics</p> <p>13 also a component of Airways Engineering?</p> <p>14 A. It just meant that it was</p> <p>15 cleared to be purchased. That's all.</p> <p>16 Q. And to your knowledge, did</p> <p>17 Dallah Avco have any role in that step of the</p> <p>18 process?</p> <p>19 A. Yes. A lot of this stuff they</p> <p>20 already had. They may have some in stock or</p> <p>21 whatever like that, but the -- Alp Karli</p> <p>22 would take boxes of these things over, they'd</p> <p>23 take a look at them, and then they would go</p> <p>24 off to contractors and whatever like that.</p> <p>25 Q. Other than Alp Karli, though,</p>	<p style="text-align: right;">Page 97</p> <p>1 Q. I was just about to ask.</p> <p>2 Do you see your initials there?</p> <p>3 A. Those are my initials.</p> <p>4 Q. Do those initials indicate that</p> <p>5 you prepared this document for Al-Salmi to</p> <p>6 sign?</p> <p>7 A. That indicates that -- yes.</p> <p>8 Q. Who selected which vendor would</p> <p>9 receive a purchase request like this?</p> <p>10 A. It was based on the -- they had</p> <p>11 a list of manufacturers and everything. If</p> <p>12 the parts came out of the States, it would go</p> <p>13 to who was supporting us in the States. So</p> <p>14 it would go to Ercan, and then Ercan would</p> <p>15 purchase it in the States. If it was like in</p> <p>16 England, then it would be processed --</p> <p>17 they -- they had other departments to process</p> <p>18 it through.</p> <p>19 Q. And in selecting that vendor,</p> <p>20 is that something you would personally decide</p> <p>21 or would it be decided by people acting under</p> <p>22 your direction?</p> <p>23 A. No. No, it was -- this would</p> <p>24 be a list of the equipment he was supporting.</p> <p>25 Okay? In other words, this stuff came from</p>



<p style="text-align: right;">Page 98</p> <p>1 the States. The equipment was from the 2 States. Okay? 3 If it was from England, then 4 they had a separate operation for England. 5 Okay? I can't remember the name of it. 6 But -- off the top of my head right now, I'm 7 sorry, I can't remember. But each one would 8 be processed to the supplier of the country. 9 We had suppliers in Italy. We 10 had suppliers in France. We had suppliers in 11 Germany and Italy. It was all over the 12 place. 13 Q. So my question, though, is, 14 if -- so if you had a purchase requisition 15 that you had approved for a particular 16 component like disc drive upper/lower heads, 17 who was responsible for looking at these 18 vendor lists and identifying the vendor that 19 would supply those parts? 20 A. You take the part and the 21 country that it came from, and that's how it 22 was determined. It was determined. It 23 wasn't selected. It was determined that the 24 parts came -- the equipment came from this 25 country, so they got the contract. Because</p>	<p style="text-align: right;">Page 100</p> <p>1 it. 2 (Coombs Exhibit 816 marked for 3 identification.) 4 QUESTIONS BY MR. KRY: 5 Q. All right. Let's take a look 6 at another document which we will mark as 7 Exhibit 816, produced at DA10334. 8 This is a February 22, 1997 9 request for payment letter from you, Samuel 10 G. Coombs, to Fareed Bogary at Dallah Avco, 11 together with some attachments again. And 12 the body of the letter indicates that it 13 relates to PR number 76224, which is the 14 same -- the same purchase requisition we were 15 just looking at. 16 A. Yes. 17 Q. We're going to turn, first of 18 all, to DA10338. 19 Do you recognize this as the 20 exact same document we were just looking at, 21 the purchase requisition from -- 22 A. Yes. 23 Q. Okay. And then we'll turn next 24 to page DA10335. 25 This is an invoice from Ercan</p>
<p style="text-align: right;">Page 99</p> <p>1 it's more efficient than going through 2 another party to then get to them and then 3 come to us, because then you're adding 4 another step to the process. 5 Q. Okay. To your knowledge, did 6 Dallah Avco have any role in identifying 7 particular vendors that should receive 8 purchase requests like these? 9 A. In some cases they did, if they 10 had somebody that was doing the support 11 element. 12 It wasn't anything I could 13 call. Sometimes it would change. 14 Q. Would that be -- would that 15 happen most of the time or would that be an 16 unusual occurrence? 17 A. No, it was -- it was an 18 intermediate {sic} thing. It just depended 19 on the availability of the equipment and the 20 supplies. We contact them and said, we need 21 this, and they said, well, we don't have it. 22 Then we put out a request to 23 find out where it was and then issue a 24 purchase order -- order based on that. 25 Request for quote. That's how we would do</p>	<p style="text-align: right;">Page 101</p> <p>1 for PR number 76224, listing the same disk 2 drive components that were on the purchase 3 requisition. 4 At the top right, there's a 5 line that says, "Date shipped, March 29, 6 1996." 7 What do you understand that 8 that date to refer to? 9 A. The date shipped is from them 10 to -- that was the date shipped from the US. 11 Q. At the top left -- at the top 12 left -- 13 A. Yeah. 14 Q. At the top left the invoice 15 says, "Sold and shipped to Dallah Avco Trans 16 Arabia, Presidency of Civil Aviation, Airways 17 Engineering ANSS III program, PO Box 15441." 18 Do you recognize that PO Box 19 address as the Airways Engineering offices 20 where you worked? 21 A. Yes. I don't remember the 22 number, but it is there, yeah. 23 Q. If we can just flip up to the 24 first page of the document for a moment. 25 At the very bottom line, do you</p>

<p style="text-align: right;">Page 102</p> <p>1 see it says, "Please reply to director 2 general Airways Engineering, PO Box 15441"? 3 Does that refresh your 4 recollection that that is the PO box for the 5 Airways Engineering? 6 A. Yeah. 7 Q. In the body of the invoice on 8 page 10355, there's a unit price of \$895 and 9 a total price of \$27,520. 10 To your knowledge, who 11 determined what price Ercan would charge for 12 parts like these? 13 A. Off the top of my head, it was 14 a cost-plus process. 15 Q. So to your knowledge, did 16 Dallah Avco have any role in determining the 17 prices that Ercan put on its invoices? 18 A. No. 19 Q. At the bottom of the invoice 20 there's a stamp that says, "Approved for 21 payment, PR 76224." 22 Do you see your initials on 23 that stamp? 24 A. Yeah. 25 Q. Does that indicate that you had</p>	<p style="text-align: right;">Page 104</p> <p>1 Q. Okay. Based on the dates, it 2 seems like there were some pretty significant 3 delays both before Ercan issued its invoice 4 and before the PCA received those parts. 5 Were delays like those common 6 in your experience, working with vendors like 7 Ercan? 8 A. Well, it may not -- go up to 9 the page with the stamp on it. 10 Q. Does the invoice -- 11 A. Right there. That's customs 12 clearance right there. 13 Q. Okay. 14 A. See that, that stamp on there? 15 Go back down. Go back down. No, stop right 16 there. 17 Where it says "receiving" and 18 that stamp on there, that means that it went 19 through customs. 20 Q. Okay. So it may take some time 21 for part shipments like these to go through 22 customs? 23 A. Yeah. In other words, it was 24 picked up from customs on 2/16. That custom 25 stamp had to be on there, okay, for us to get</p>
<p style="text-align: right;">Page 103</p> <p>1 approved payment of this invoice? 2 A. That meant that it had arrived, 3 that it had -- had come into the warehouse, 4 and then I just -- {audio interruption} -- 5 stamp on it and go. 6 Q. Did Dallah Avco have any role 7 in that step of the process where you -- 8 A. Oh, no, huh-uh. 9 Q. We'll turn next to page 10 DA10336. This is a Presidency of Civil 11 Aviation material receiving report -- 12 A. Yes. 13 Q. -- for PR 76224. It includes a 14 few signatures dated February 16, 1997. And 15 if we go down to the second page, we can see 16 that the receiving report relates to the same 17 parts, the ten disc drive upper heads, ten 18 disc lower heads and ten disc plotters. 19 Would PCA employees fill out 20 this material receiving report once they 21 actually received shipment of the parts? 22 A. When the parts came to the 23 warehouse, the receiving in the warehouse 24 would break them down and pass it off. And 25 basically they'd say, okay, we got this.</p>	<p style="text-align: right;">Page 105</p> <p>1 it. It had to go through Saudi customs. 2 Q. Okay. Finally, we'll turn back 3 to the first page, which was DA10334. This 4 is the request for payment letter that you, 5 Samuel Coombs, sent to Fareed Bogary at 6 Dallah Avco on February 22, 1997, six days 7 after the material receiving report. 8 And it says, "Please provide 9 payment of US dollar \$27,520.96 to our 10 vendor, Ercan, Inc., against the following 11 document," and then it lists the PR 12 number 76224. 13 Do you recognize your signature 14 at the bottom of this document? 15 A. Yes, that's my signature. 16 Q. And below that are the initials 17 MB. 18 Do you recognize those as 19 Mohammed Basharahil's initials? 20 A. Yes. 21 Q. Was one of Dallah Avco's 22 responsibilities to pay subcontractor 23 invoices like this one from Airways 24 Engineering? 25 A. Depending on how they worked --</p>

<p style="text-align: right;">Page 106</p> <p>1 see, after I signed off on this and  2 everything, it would go to Alp Karli. Or if  3 Mohammed Al-Salmi was available, I'd take it  4 to him and then he'd give it to Karli.  5 Q. And once Alp Karli or Al-Salmi  6 had received the document, would it be sent  7 to Dallah Avco?  8 A. And then he would take it to  9 Dallah. He'd go to the Dallah tower.  10 Q. And Dallah tower, is that where  11 Fareed Bogary had his offices?  12 A. Have you ever seen the Dallah  13 building in Jeddah, Saudi Arabia?  14 Q. I have.  15 A. Huh?  16 Q. I have, actually.  17 A. Okay. That's the reason I call  18 it the Dallah tower.  19 Q. Very good.  20 A. All their administrative  21 offices and everything else were in the  22 tower.  23 Q. To your knowledge, when Dallah  24 Avco received a request for payment like this  25 from Airways Engineering, did Dallah Avco</p>	<p style="text-align: right;">Page 108</p> <p>1 identification.)  2 QUESTIONS BY MR. KRY:  3 Q. We'll take a look at another  4 exhibit. We'll mark this one Exhibit 817,  5 produced at KSA2127.  6 This is an excerpt from the  7 financial condition section of the contract  8 between Dallah Avco and the PCA called the  9 ANSS 4 contract, and we'll look at, in  10 particular, Section 3-3-1-1 on page KSA2135.  11 That provision is titled  12 "Entitlement," and it says, "The contractor  13 shall be entitled each month to be paid for  14 logistics support purchases made during  15 previous months and for special cost items as  16 described in Section 4, scope of services,  17 Article 4-3."  18 Is that provision consistent  19 with your understanding that Dallah Avco was  20 entitled to be reimbursed by the PCA for the  21 vendor invoices that it paid?  22 A. Yes.  23 Q. All right. During your  24 testimony earlier today, you had mentioned  25 that -- well, no, strike that.</p>
<p style="text-align: right;">Page 107</p> <p>1 have any responsibility for reviewing or  2 auditing the reasonableness of the prices  3 that were reflected on the invoices?  4 A. No. No.  5 Q. Did Dallah Avco have any  6 responsibility for reviewing or auditing  7 whether Airways Engineering actually needed  8 the goods or services that were reflected on  9 the invoices?  10 A. No.  11 Q. Did Dallah Avco have any  12 responsibility for reviewing or auditing  13 Airways Engineering's selection of a vendor  14 to provide those goods and services?  15 A. No.  16 Q. Was Dallah Avco's job  17 essentially just to pay the invoices  18 according to the terms that Airways  19 Engineering had approved?  20 A. Yes.  21 Q. To your knowledge, was Dallah  22 Avco entitled to be reimbursed by the PCA  23 after it paid a vendor invoice like this one?  24 A. Yeah.  25 (Coombs Exhibit 817 marked for</p>	<p style="text-align: right;">Page 109</p> <p>1 (Coombs Exhibit 818 marked for  2 identification.)  3 QUESTIONS BY MR. KRY:  4 Q. We'll mark as Exhibit 818 a  5 document produced at DA10725.  6 This is a different and  7 unrelated purchase request from Al-Salmi to  8 Ercan dated September 26, 1995, and I'm going  9 to turn to one of the purchase requisitions  10 that's on page DA10731.  11 Do you recognize your signature  12 on this document?  13 A. Yes.  14 Q. So this purchase requisition  15 is -- lists items described as Defense  16 Language Institute. And if we scroll to the  17 third page of the requisition, it identifies  18 the manufacturer as Defense Language  19 Institute, English Language Center, based at  20 Lackland Air Force base in Texas.  21 Do you remember sending  22 requisitions for educational materials from  23 the English Language Center in Texas during  24 your time at logistics?  25 A. I used to call them sidebars.</p>

<p style="text-align: right;">Page 110</p> <p>1 In other words, that was something that --</p> <p>2 they were paying for something, and I</p> <p>3 wouldn't even know what it was, but it was</p> <p>4 given to me to do it.</p> <p>5 Q. When you received purchase</p> <p>6 requisitions like this, did you think there</p> <p>7 was anything inappropriate about the PCA</p> <p>8 using logistics funds for English language</p> <p>9 education materials?</p> <p>10 A. I didn't ask questions about</p> <p>11 it. I just -- I just knew that they were</p> <p>12 going to do it whether I approved or not.</p> <p>13 Inside the Presidency of Civil</p> <p>14 Aviation, there was direct payments all over</p> <p>15 the world that I had no clue. What was</p> <p>16 inside my department I could do. If it came</p> <p>17 in direct -- and Mohammed would come in with</p> <p>18 a handful of them, and he'd say, we got to</p> <p>19 process this. And we weren't getting</p> <p>20 anything in logistics for it.</p> <p>21 Q. When you saw a requisition like</p> <p>22 this that related specifically to English</p> <p>23 language education materials, did you have</p> <p>24 concerns that there was something illegal</p> <p>25 with processing a purchase requisition for</p>	<p style="text-align: right;">Page 112</p> <p>1 worked before. They were all connected.</p> <p>2 Some of the stuff would just come in, and I'd</p> <p>3 just do it.</p> <p>4 Q. My question is, were English</p> <p>5 language skills a helpful qualification for</p> <p>6 certain individuals who worked at the PCA?</p> <p>7 A. Yeah.</p> <p>8 MR. CARTER: Objection to form.</p> <p>9 QUESTIONS BY MR. KRY:</p> <p>10 Q. And so at the time did you</p> <p>11 perceive that there was something</p> <p>12 inappropriate about the PCA funding education</p> <p>13 skills that were going to be relevant to the</p> <p>14 job qualifications of the people that work</p> <p>15 there?</p> <p>16 A. It was normally the younger</p> <p>17 students that didn't speak any Arabic, and</p> <p>18 they would like -- just down the road where</p> <p>19 I'm at is Fort Benning, Georgia. They'd send</p> <p>20 them money to pay for the students to be</p> <p>21 trained there, the Saudi students there.</p> <p>22 Okay?</p> <p>23 Where are you at?</p> <p>24 You know, they -- there's</p> <p>25 schools in all of the military bases here in</p>
<p style="text-align: right;">Page 111</p> <p>1 materials like this?</p> <p>2 MR. CARTER: Objection to form</p> <p>3 and foundation.</p> <p>4 THE WITNESS: I was so used to</p> <p>5 seeing it, it was normal. Okay?</p> <p>6 Because they would give gifts. A</p> <p>7 gift, money under the table. Okay?</p> <p>8 Called baksheesh in Arabic. This was</p> <p>9 normal. They may be paying for</p> <p>10 somebody to get in, that they wanted</p> <p>11 in.</p> <p>12 So we just processed it. We</p> <p>13 didn't question it.</p> <p>14 QUESTIONS BY MR. KRY:</p> <p>15 Q. Would English language skills</p> <p>16 be an important job qualification for PCA</p> <p>17 employees or prospective PCA employees?</p> <p>18 A. Well, see, you'll notice this</p> <p>19 is an Air Force base. Okay? And the Saudi</p> <p>20 Air Force and folks were all connected,</p> <p>21 because the Presidency of Civil Aviation was</p> <p>22 right down the street. Saudi Air Force was</p> <p>23 under them.</p> <p>24 And then on the other side of</p> <p>25 them was Kawasaki Helicopter, where I had</p>	<p style="text-align: right;">Page 113</p> <p>1 the States that train foreign military in the</p> <p>2 United States, and that can be what that was.</p> <p>3 I didn't question -- I didn't</p> <p>4 question it.</p> <p>5 Q. Right.</p> <p>6 And you didn't see any reason</p> <p>7 to question it because it wasn't anything</p> <p>8 that you --</p> <p>9 A. Yes.</p> <p>10 Q. Did you believe that there was</p> <p>11 anything improper with the PCA funding</p> <p>12 English studies education for its own</p> <p>13 employees?</p> <p>14 A. No.</p> <p>15 Q. To your knowledge, who decided</p> <p>16 to spend Airways Engineering logistics' funds</p> <p>17 on English language educational materials</p> <p>18 like these?</p> <p>19 MR. CARTER: Objection to form.</p> <p>20 THE WITNESS: Normally it</p> <p>21 was -- normally it was the Presidency</p> <p>22 of Civil Aviation down to Al-Salmi,</p> <p>23 who was assigned above him.</p> <p>24 QUESTIONS BY MR. KRY:</p> <p>25 Q. And to your knowledge, did</p>



<p style="text-align: right;">Page 114</p> <p>1 Dallah Avco have any role in deciding to  2 spend logistics' funds on English language  3 education materials?  4 A. No, not that I know of.  5 MR. KRY: All right. Why  6 don't -- how long have we been going  7 for?  8 VIDEOGRAPHER: 42 minutes.  9 MR. KRY: Okay. We can keep  10 going.  11 Do you need a break, or are you  12 going to keep going, Mr. Coombs?  13 THE WITNESS: Keep going.  14 QUESTIONS BY MR. KRY:  15 Q. Great.  16 Let's put up a document that  17 was previously marked Exhibit 812. This is  18 DA2267, the March 30, 1994 letter from  19 Al-Salmi to Avco Overseas in Texas.  20 A. Yes.  21 Q. It says, "You are hereby" --  22 I'm sorry. It says, "You are requested to  23 pay the tuition for Mr. Omar Al-Bayoumi of US  24 \$4,430 to the American Language Institute."  25 And then it says, "In addition,</p>	<p style="text-align: right;">Page 116</p> <p>1 signature at the bottom of the document?  2 A. Yes, that's Al-Salmi's  3 signature.  4 Q. And down and to the left there  5 are some initials which are hard to see, but  6 to me it looks like a A on top of a J.  7 Do you recognize those as the  8 initials of A.L. Jones?  9 A. Alp Karli. It looks like Alp  10 Karli.  11 Q. You think those are Alp Karli's  12 initials?  13 A. Yeah.  14 Q. Okay. In your declaration, you  15 mentioned that there were financial  16 directives, was the term you used, that  17 Al-Salmi would periodically send directing  18 the payment of educational expenses for PCA  19 employees.  20 Is this letter an example of  21 one of those financial directives that you  22 were referring to?  23 A. Yes.  24 Q. And to your knowledge, did  25 Dallah Avco have any role in preparing</p>
<p style="text-align: right;">Page 115</p> <p>1 you are requested to pay weekly living  2 allowance up to 30 weeks of US \$600 to  3 Mr. Al-Bayoumi and invoice the ANSS III  4 project account."  5 I think you testified earlier  6 that this letter is dated March 30, 1994,  7 which is before you began work at Airways  8 Engineering; is that correct?  9 A. Yeah.  10 Q. Is that a yes?  11 A. Yes.  12 Q. Have you seen this document  13 before today?  14 A. No.  15 Q. Is that a no? Unfortunately,  16 we need to get yeses or nos for the record.  17 A. No.  18 Q. And we mentioned Avco Overseas  19 a bit earlier.  20 Do you recall them as a former  21 subcontractor for Airways Engineering?  22 A. They were a subcontractor  23 through Dallah Avco.  24 Q. Right.  25 Do you recognize Al-Salmi's</p>	<p style="text-align: right;">Page 117</p> <p>1 financial directives like this one?  2 A. No.  3 Q. Earlier today you testified  4 that when Dallah Avco settled payments for  5 invoices for expenses like this, it would  6 either pay the funds from Jeddah to a US bank  7 or it would handle the payment through -- and  8 then you referred to something called the  9 American side of Dallah Avco.  10 When you used that term, were  11 you referring to Avco Overseas?  12 A. Well, yeah. See, I -- I called  13 them Dallah Avco because that was who I had  14 originated with, and then they cut it off to  15 Avco. But my thinking was still that way.  16 And I'm sorry I said it that  17 way, but it was Avco Overseas Services, yes.  18 Q. Okay. Let's put up a document  19 previously marked Al-Bayoumi Exhibit 726,  20 produced at DA2281.  21 This is a fax from Al-Salmi to  22 Avco Overseas dated September 10, 1994, and  23 it states, "Request you pay Mr. Omar  24 Al-Bayoumi in advance all his weekly living  25 allowances instead of three installments and</p>



<p style="text-align: right;">Page 118</p> <p>1 invoice the ANSS III project account."  2 Is this another example of a  3 financial directive from Al-Salmi?  4 A. Yes.  5 Q. Do you recognize Al-Salmi's  6 signature at the bottom?  7 A. Yes, and my initials.  8 Q. And in addition to your  9 initials, do you also recognize Mohammed  10 Basharahil's initials?  11 A. Yes.  12 Q. Did you prepare this document  13 for Al-Salmi to sign?  14 A. No. It was normally prepared  15 over at the headquarters and then given to us  16 because we had to cost it out of our budget.  17 Q. Do you have any recollection of  18 this specific document?  19 A. No.  20 Q. Do you know why Al-Salmi wanted  21 Omar Al-Bayoumi to be paid all his weekly  22 living allowances in advance rather than in  23 three installments?  24 A. No, but -- it's just  25 favoritism. I'm sorry, but it's favoritism.</p>	<p style="text-align: right;">Page 120</p> <p>1 Do you recognize Al-Salmi's  2 signature at the bottom of this document?  3 A. Yes, and my initials, too.  4 Q. Did you prepare this document  5 for Al-Salmi to sign?  6 A. No.  7 Q. Do you know who prepared it?  8 A. I don't remember who prepared  9 it. I think it was -- no, I don't remember.  10 Q. The letter refers to a team  11 that Airways Engineering sent to evaluate the  12 potential replacements for Avco Overseas.  13 Do you recall being a part of  14 that team?  15 A. See, that was one of the things  16 that I went to -- yes, I was a part of the  17 team. I went to Louisville, Kentucky, okay?  18 I went to Atlanta, went to New York, went to  19 Chicago. There were several companies that  20 we searched out all over the States.  21 Q. And was that a team of  22 individuals from Airways Engineering?  23 A. It would normally be a team of  24 four people.  25 Q. Which four people were those?</p>
<p style="text-align: right;">Page 119</p> <p>1 And if it was like this, we did it.  2 (Coombs Exhibit 819 marked for  3 identification.)  4 QUESTIONS BY MR. KRY:  5 Q. Let's mark as Exhibit 819 a  6 document produced at DA10842.  7 This is an October 27, 1994  8 letter from Al-Salmi at the PCA to Samir  9 Magboul at Dallah Avco. And it states,  10 "Pursuant to your memo of the 3rd of August,  11 1994, this office dispatched a team to  12 evaluate several prospective companies in the  13 United States of America to replace Avco  14 Overseas Services of Houston, Texas.  15 "Upon completion of our  16 evaluation, it was decided Ercan Consulting  17 Engineers of Newport Beach has the present  18 ability to provide PCA Airways Engineering  19 with needed spare parts, equipment and  20 personnel.  21 "To this end, please effect  22 procedures to close out Avco Overseas  23 Services and transfer their responsibility of  24 spare parts procurement and personnel  25 recruitment to Ercan Consulting Engineers."</p>	<p style="text-align: right;">Page 121</p> <p>1 A. Normally myself and three  2 Saudis.  3 Q. Would Alp Karli be a member of  4 that team with you?  5 A. No, Alp -- Hamad Al-Rashid  6 would go with me, and I can't remember -- it  7 would fluctuate on the others depending on  8 who was available and their expertise.  9 Q. Do you know who made the  10 decision that Ercan would replace Avco  11 Overseas as the subcontractor?  12 A. I have no idea.  13 Q. To your knowledge, did Dallah  14 Avco have any role in deciding to have Ercan  15 replace Avco Overseas Services?  16 A. I don't know.  17 Q. Do you know if Dallah Avco in  18 fact recommended that the PCA should engage a  19 different company instead?  20 A. I wasn't in the inner side of  21 that. I didn't -- I don't know how it came  22 about.  23 (Coombs Exhibit 820 marked for  24 identification.)  25</p>

<p style="text-align: right;">Page 122</p> <p>1 QUESTIONS BY MR. KRY:</p> <p>2 Q. Let's mark as Exhibit 820 a</p> <p>3 document produced at DA10841. This was</p> <p>4 previously marked as Kamel Exhibit 110, but</p> <p>5 this is a more legible copy and also includes</p> <p>6 a translation.</p> <p>7 This is a letter from Al-Salmi</p> <p>8 to Samir Magboul at Dallah Avco dated</p> <p>9 6/6/1415 on the Hijri calendar, which</p> <p>10 corresponds to November 10, 1994, concerning</p> <p>11 contract to Ercan Consulting Engineers.</p> <p>12 Do you recognize Al-Salmi's</p> <p>13 signature at the bottom of that letter?</p> <p>14 A. Yes.</p> <p>15 Q. And below the signature, if we</p> <p>16 can zoom --</p> <p>17 A. Below the signature, Alp Karli</p> <p>18 to the left and my initials to the right.</p> <p>19 Q. Okay. The third paragraph</p> <p>20 states, "In light of the above, the following</p> <p>21 Airways Engineering personnel will represent</p> <p>22 this office during the contract and</p> <p>23 changeover from Avco Overseas Services to</p> <p>24 Ercan Consulting Engineers," and then it</p> <p>25 lists four people: Hamad Al-Rashid, Alp</p>	<p style="text-align: right;">Page 124</p> <p>1 Avco have any role in directing your</p> <p>2 activities on this trip?</p> <p>3 A. No.</p> <p>4 Q. Earlier today we looked at some</p> <p>5 financial directives that Al-Salmi sent to</p> <p>6 Avco Overseas directing it to pay education</p> <p>7 and living expenses to Al-Bayoumi.</p> <p>8 After Ercan took over as</p> <p>9 subcontractor for Avco Overseas, did Al-Salmi</p> <p>10 issue similar financial directives to Ercan</p> <p>11 directing it to pay Al-Bayoumi's education</p> <p>12 and living expenses?</p> <p>13 A. Yes, yes.</p> <p>14 Q. Did you ever see a letter from</p> <p>15 Al-Salmi directing Ercan to make those</p> <p>16 payments?</p> <p>17 A. I saw two, but -- I remember it</p> <p>18 coming across my desk. That's all I</p> <p>19 remember.</p> <p>20 Q. Do you remember the approximate</p> <p>21 time frame when you saw those letters?</p> <p>22 A. It was after I had gone out to</p> <p>23 visit them.</p> <p>24 Q. Would it have been in the 1995</p> <p>25 time frame?</p>
<p style="text-align: right;">Page 123</p> <p>1 Karli, yourself and Najib Mustafa.</p> <p>2 Who was Hamad Al-Rashid?</p> <p>3 A. Hamad Al-Rashid was -- he</p> <p>4 worked over at the main building. He was</p> <p>5 responsible for the contracts for all the</p> <p>6 compounds where we had the navigation systems</p> <p>7 all around the Kingdom, and he was</p> <p>8 responsible for the maintenance of the</p> <p>9 fencing and, you know, things like that. And</p> <p>10 he would normally buy large quantities of,</p> <p>11 like, fencing, you know, roofing, air</p> <p>12 conditioners, stuff like that.</p> <p>13 Q. Was he a civil servant at the</p> <p>14 PCA?</p> <p>15 A. Pardon?</p> <p>16 Q. Was he a civil servant at the</p> <p>17 PCA?</p> <p>18 A. Yes, he was definitely that.</p> <p>19 Q. And what about Najib Mustafa,</p> <p>20 was he another civil servant at the PCA?</p> <p>21 A. Yes.</p> <p>22 Q. Did anyone from Dallah Avco</p> <p>23 accompany the four of you on this trip?</p> <p>24 A. No.</p> <p>25 Q. To your knowledge, did Dallah</p>	<p style="text-align: right;">Page 125</p> <p>1 A. I think so, yeah.</p> <p>2 Q. Do you have any role in</p> <p>3 preparing or approving those two letters?</p> <p>4 A. No.</p> <p>5 Q. Do you know who prepared those</p> <p>6 letters?</p> <p>7 A. I'm not really sure. It could</p> <p>8 have been Alp Karli or -- no, I can't</p> <p>9 remember.</p> <p>10 Q. Were both letters over</p> <p>11 Al-Salmi's signature?</p> <p>12 A. Yes.</p> <p>13 Q. To your knowledge, did Ercan in</p> <p>14 fact make the payments for education and</p> <p>15 living expenses to Al-Bayoumi that were</p> <p>16 directed in those letters?</p> <p>17 MR. DORRIS: Objection to form.</p> <p>18 THE WITNESS: I'm certain they</p> <p>19 did.</p> <p>20 QUESTIONS BY MR. KRY:</p> <p>21 Q. Do you know why Al-Salmi</p> <p>22 arranged for subcontractors like Avco</p> <p>23 Overseas and Ercan to pay education and</p> <p>24 living expenses rather than just paying those</p> <p>25 expenses from the PCA directly?</p>

<p style="text-align: right;">Page 126</p> <p>1 A. Convenience. It was quicker.  2 Q. Why is that --  3 A. Sometimes -- sometimes the  4 internal process could take as much as two  5 months if it was paid to -- so he would pass  6 it off to the contractors to pay it and then  7 pay the commission.  8 Q. Were there any other reasons  9 why it was more convenient to have the  10 expenses paid through subcontractors rather  11 than directly from the PCA?  12 A. Like I said, the approval  13 process for the government itself to send the  14 money was a very long process. Okay? If  15 they had to go to the Presidency of Civil  16 Aviation. So he ran most of the stuff  17 through subcontractors because it was  18 quicker.  19 Q. All right. Let's take a look  20 again at your declaration, please, which was  21 marked Exhibit 810.  22 Page 2 of that declaration  23 says, "The logistics budget" -- there it is.  24 "The logistics department budget was used for  25 the purchase of equipment and logistical</p>	<p style="text-align: right;">Page 128</p> <p>1 California. I don't know what he was  2 studying.  3 Q. Do you know whether he was  4 studying something?  5 A. No.  6 Q. Do you know whether -- well,  7 strike that.  8 Did you ever learn any  9 information that caused you to doubt that  10 Al-Salmi {sic} was pursuing some sort of  11 educational studies in the United States?  12 A. I didn't doubt it, you know,  13 but everybody said he was in school, so I  14 just didn't question it.  15 Q. When you say "everybody said he  16 was in school," who are you referring to as  17 "everybody"?  18 A. The people talking around  19 the -- inside the -- you know, like when  20 they said, yeah, he's in the States. You  21 know, I'd ask a question, and they'd say,  22 yeah, he's in the States going to school.  23 Q. Approximately how many people  24 made comments like that to you?  25 A. Four or five. You know, Alp</p>
<p style="text-align: right;">Page 127</p> <p>1 support for the numerous aeronautical  2 navigation systems located throughout the  3 Kingdom of Saudi Arabia. The navigational  4 systems were for both aircraft and  5 ground-based systems such as air traffic  6 control towers. The budget was also used,  7 among other things, for paying Saudi Arabian  8 students studying abroad who were PCA  9 employees or aspiring employees of the PCA."  10 A. Yeah.  11 Q. Is that all accurate?  12 A. Yes.  13 Q. Was Al-Bayoumi an example of  14 one of those PCA employees studying abroad?  15 A. Yes.  16 Q. And were the financial  17 directives that Al-Salmi sent to Avco  18 Overseas and Ercan examples of Al-Salmi using  19 the logistics budget to pay Saudi Arabian  20 students studying abroad who were PCA  21 employees or aspiring employees of the PCA?  22 A. Yes. Yes.  23 Q. Do you know whether Al-Bayoumi  24 was in fact studying abroad?  25 A. Well, I know that he was in</p>	<p style="text-align: right;">Page 129</p> <p>1 Karli and Hamad Rashid -- Hamad Al-Rashid.  2 There's several of them that would say things  3 like that to me. So I just quit asking.  4 Q. And at any time did anyone tell  5 you that Al-Bayoumi actually was not pursuing  6 educational studies in the United States?  7 A. No.  8 Q. Did anyone tell you whether  9 Al-Bayoumi's studies in the United States  10 were related to his job skills or  11 qualifications at the PCA?  12 A. No.  13 Q. To your knowledge, did anyone  14 at Dallah Avco have any role in deciding to  15 use logistics funds to fund the educational  16 payments for Saudi students that you referred  17 to in your declaration?  18 A. No. No.  19 Q. On page 3 of the declaration,  20 you say that "Mr. Al-Bayoumi regularly  21 claimed unusual additional expenses that were  22 not provided to other students. I can recall  23 payments for his wife's frequent travel to  24 and from Saudi Arabia and the United States.  25 Also, on one occasion I saw a request that</p>

<p style="text-align: right;">Page 130</p> <p>1 Mr. Al-Bayoumi wanted to get one new car for 2 himself so that his wife could take 3 possession of his car that was only a year 4 old." 5 In what sense were those 6 expenses unusual in your view? 7 A. Well, the other students didn't 8 have cars. 9 Q. Was there any other respect in 10 which the expenses were unusual? 11 A. It just seemed that, you 12 know -- I told him that Mr. Al-Salmi had to 13 approve that. I didn't have the authority 14 to. 15 Q. So is it fair to say that the 16 reason you considered the expenses unusual 17 was just that they were -- gave Al-Bayoumi a 18 higher standard of living than the other 19 Saudi students that were being funded through 20 logistics? 21 A. Yes. 22 Q. Other than travel expenses for 23 Al-Bayoumi's wife to go back and forth to 24 Saudi Arabia and the new car so that 25 Al-Bayoumi's wife could use his old car, do</p>	<p style="text-align: right;">Page 132</p> <p>1 Q. To your knowledge, would Dallah 2 Avco have had any authority to refuse to pay 3 a logistics invoice from Airways Engineering 4 just because Dallah Avco had made its own 5 determination that particular expenses were 6 too high? 7 MR. DORRIS: Objection. Form. 8 THE WITNESS: No, not if they 9 were signed off on, no, they couldn't. 10 QUESTIONS BY MR. KRY: 11 Q. At any time did you ever learn 12 that Al-Bayoumi was using his educational 13 funding to plan terrorist attacks or engage 14 in other criminal activity in the United 15 States? 16 A. No. No. 17 Q. At any time did you even 18 suspect that Al-Bayoumi was using his 19 educational funding to plan terrorist attacks 20 or engage in other criminal activity in the 21 United States? 22 A. No. 23 Q. If you had learned that 24 Al-Bayoumi was using his student funding to 25 plan terrorist attacks or engage in other</p>
<p style="text-align: right;">Page 131</p> <p>1 you recall any other specific examples of 2 Al-Bayoumi's expenses that you considered 3 unusual? 4 A. I couldn't detail it, but I 5 just thought that they were all quite high. 6 That's all. 7 Q. My only question is, are there 8 any specific expenses that you recall 9 standing out as being qualitatively unusual, 10 other than the travel for Mr. Al-Bayoumi's 11 wife back to Saudi Arabia and the new car for 12 Al-Bayoumi? 13 A. No. 14 Q. Did you ever complain to 15 Al-Salmi that Al-Bayoumi's expenses were 16 unusual? 17 A. Yes, and I got corrected. 18 Q. What did Al-Salmi tell you? 19 A. What he told me is, he said, 20 that's not for you to worry about. 21 Q. Did you ever complain to Dallah 22 Avco that Al-Bayoumi's expenses were unusual? 23 A. No. Dallah was the 24 subcontractor. I didn't talk to them about 25 that.</p>	<p style="text-align: right;">Page 133</p> <p>1 criminal activity, would you have reported 2 that information to Al-Salmi? 3 A. I first would have gone to the 4 military attache at the embassy, and then I 5 would have reported it to him. 6 Q. Would you have reported that 7 information to law enforcement? 8 A. Not directly. Military attache 9 at the US Embassy would be who I would 10 contact first. 11 Q. Would you understand that they 12 would report the information to law 13 enforcement as appropriate? 14 A. Through the chain of command, 15 yes, they would. 16 Q. Okay. Okay. We are going to 17 need to go on the FBI record for the next few 18 exhibits. If we can ask the tech to remove 19 anyone who's not cleared for FBI documents 20 from the room, please, and let me know when 21 we're ready. 22 VIDEOGRAPHER: I have the six 23 counsel who are not cleared in the 24 breakout room. 25 ***BEGIN FBI CONFIDENTIAL PORTION***</p>

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1 (Coombs Exhibit 821 marked for  
2 identification.)  
3 QUESTIONS BY MR. KRY:  
4 Q. So we will mark as Exhibit 821  
5 a document produced at [REDACTED] This is the  
6 FBI's summary of an interview that occurred  
7 on -- an interview that occurred with you on  
8 April 3, 2002.  
9 First of all, Mr. Coombs, have  
10 you seen these FBI summaries of their  
11 interviews with you?  
12 A. No, I haven't seen this.  
13 Q. Okay. Do you recall giving a  
14 number of interviews to the FBI back in 2002  
15 and 2004?  
16 A. Yes. Yeah, my -- Tom Wallace,  
17 who replaced me, went with me over there.  
18 Q. Okay. [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED].  
24 [REDACTED]  
25 [REDACTED]

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1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]. Omar  
4 Al-Bayoumi was one of these ghost employees.  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 Do you recall providing that  
10 information to the FBI during your April 2002  
11 interview?  
12 A. Yes.  
13 Q. [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 A. Yes.  
18 Q. And are those ghost employees  
19 the same individuals you referred to in your  
20 declaration when you said that Al-Salmi had  
21 used the logistics budget that pays Saudi  
22 Arabian students studying abroad who were PCA  
23 employees or aspiring employees of the PCA?  
24 A. Yes.  
25 Q. So you used the terms "ghost

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1 employees" and "students" to refer to the  
2 same people?  
3 A. Yes.  
4 Q. [REDACTED]  
5 [REDACTED], did  
6 you mean that they were being paid to pursue  
7 educational studies rather than being paid to  
8 perform other types of work at Airways  
9 Engineering?  
10 A. I saw some of the students come  
11 back and never go to work. That was the  
12 reason I started calling them ghost  
13 employees, the students.  
14 Q. With respect to the -- what  
15 they were doing during the time that they  
16 were having their educational studies funded,  
17 did you understand that they were actually  
18 pursuing educational studies?  
19 A. I couldn't tell from my end.  
20 Q. Did you ever have a basis for  
21 saying that [REDACTED] during  
22 the time period that they were supposed to be  
23 pursuing educational studies?  
24 A. I didn't know. [REDACTED]  
25 [REDACTED]

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1 [REDACTED].  
2 Q. Right.  
3 So setting aside what they may  
4 have done after they came back to Saudi  
5 Arabia, during -- during the time that those  
6 individuals were outside the Kingdom in other  
7 countries, did you have any firsthand  
8 knowledge of whether they were pursuing  
9 educational studies [REDACTED] ?  
10 A. No.  
11 Q. [REDACTED]  
12 [REDACTED]  
13 [REDACTED]. And I think we discussed  
14 earlier that Avco Overseas was a  
15 subcontractor of Dallah Avco.  
16 Do you recall that testimony?  
17 A. Yes.  
18 Q. [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 A. [REDACTED]  
25 [REDACTED]



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1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 Q. Okay. Do you recall testifying  
 6 earlier that you didn't have any firsthand  
 7 knowledge, though, of whether that was just a  
 8 subcontractor relationship or a -- some sort  
 9 of corporate affiliation?  
 10 A. No, I didn't have any firsthand  
 11 knowledge of it myself. It was secondhand.  
 12 Q. [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 Do you recall making that  
 18 statement to the FBI?  
 19 A. [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 Q. Okay. So apart from the --  
 25 A. And then -- it's hard to

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1 remember. I just can't remember all the  
 2 details.  
 3 Q. That's fine.  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED] is the rest of that  
 7 sentence consistent with your recollection of  
 8 what you told the FBI?  
 9 A. Yeah, that's what -- see, when  
 10 I would talk to Al-Salmi about things, he  
 11 would, you know -- he would correct me, and I  
 12 would settle down. I knew better than to  
 13 confront him if there was a question. I  
 14 questioned things, and when I would  
 15 questioned it, I would get -- I never went  
 16 back. I just left it alone.  
 17 Q. [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 A. [REDACTED]  
 22 Q. Did Al-Salmi ever tell you that  
 23 Dallah Avco wanted Al-Bayoumi to stay in  
 24 America?  
 25 A. No.

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1 Q. Did Al-Salmi ever tell you that  
 2 Bayoumi was not a student?  
 3 A. Say again?  
 4 Q. Did Al-Salmi ever tell you that  
 5 Bayoumi was not a student?  
 6 A. No.  
 7 Q. [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 My question is, do you have any  
 17 personal knowledge at all about [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 A. [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 Q. [REDACTED]  
 25 [REDACTED]

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1 [REDACTED]  
 2 A. [REDACTED]  
 3 Q. [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 A. [REDACTED]  
 17 Q. [REDACTED]  
 18 [REDACTED]  
 19 A. [REDACTED]  
 20 Q. [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

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1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 And then dropping down a couple  
 8 of sentences, it says, "In April of 2000, the  
 9 other allowance jumps to 14,271 riyals and  
 10 stays at that level until December 2000."  
 11 Do you remember discussing  
 12 those other allowances with the FBI?  
 13 A. No, I didn't -- I didn't even  
 14 know the numbers.  
 15 Q. Okay. And in fact, April 2000  
 16 is three years after you left the company,  
 17 right?  
 18 A. Yeah. Yes.  
 19 Q. And I think you testified  
 20 earlier that the -- the department of the PCA  
 21 that would be responsible for setting  
 22 salaries and allowances for project employees  
 23 was a different department of the Airways  
 24 Engineering than your logistics department;  
 25 is that right?

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1 A. Yes.  
 2 Q. All right. We'll take that  
 3 down.  
 4 (Coombs Exhibit 822 marked for  
 5 identification.)  
 6 QUESTIONS BY MR. KRY:  
 7 Q. And we'll mark as Exhibit 822 a  
 8 document produced at [REDACTED] This is a  
 9 summary of another interview that you had  
 10 with the FBI that took place on July 16,  
 11 2002.  
 12 On page 1, the second paragraph  
 13 states, [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 A.  
 21 Q.  
 22 A.  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

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1 Q. [REDACTED]  
 2 [REDACTED]  
 3 A. [REDACTED]  
 4 [REDACTED]  
 5 Q. [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED] ?  
 9 A. [REDACTED]  
 10 [REDACTED]  
 11 Q. [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 A. [REDACTED]  
 15 Q. [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 A. [REDACTED]  
 19 Q. [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 A. [REDACTED]  
 23 [REDACTED]  
 24 Q. [REDACTED]  
 25 [REDACTED]

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1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED] is that based on any  
 4 personal knowledge that you have?  
 5 A. [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 Q. [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 A. [REDACTED]  
 21 Q. All right. [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED] do you have any  
 24 personal knowledge that [REDACTED]  
 25 [REDACTED]

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1 [REDACTED]  
 2 [REDACTED]  
 3 A. [REDACTED]  
 4 Q. [REDACTED]  
 5 [REDACTED]  
 6 A. No [REDACTED]  
 7 Q. [REDACTED]  
 8 [REDACTED]  
 9 A. [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 Q. [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 A. [REDACTED]  
 18 [REDACTED]  
 19 Q. [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

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1 [REDACTED]  
 2 [REDACTED]  
 3 My question is, do you have any  
 4 personal knowledge of any facts showing that  
 5 [REDACTED]  
 6 [REDACTED]  
 7 A. Not directly.  
 8 Q. So in this memo you  
 9 characterized your belief as speculation.  
 10 Is that an accurate  
 11 description?  
 12 A. Yes, it was speculation.  
 13 Q. Later on this page, the report  
 14 says, [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 A. Yes.  
 22 Q. Is that statement accurate?  
 23 A. Yes.  
 24 Q. [REDACTED]  
 25 [REDACTED]

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1 [REDACTED]  
 2 [REDACTED]  
 3 Is that statement accurate?  
 4 A. Yes.  
 5 (Coombs Exhibit 823 marked for  
 6 identification.)  
 7 QUESTIONS BY MR. KRY:  
 8 Q. All right. We'll mark as  
 9 Exhibit 823 a document produced at [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 Is that statement accurate?  
 21 A. Yes.  
 22 Q. [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

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1 [REDACTED]  
 2 A. No.  
 3 (Coombs Exhibit 824 marked for  
 4 identification.)  
 5 QUESTIONS BY MR. KRY:  
 6 Q. And the last document. We'll  
 7 mark this as Exhibit 824, I believe. This is  
 8 produced at [REDACTED] [REDACTED]  
 9 [REDACTED] the FBI summary of  
 10 your first interview that we looked at at the  
 11 very beginning of this line of questioning,  
 12 dated April 3, 2002.  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 And if you look down at  
 19 subsequent pages of this version of the  
 20 summary, [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 A. No, I didn't even...

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1 Q. All right. We can take that  
2 document down. Just a couple last few  
3 questions.  
4 MR. DORRIS: Before -- I don't  
5 think the court reporter got the  
6 entire answer to that question.  
7 "No, I didn't even" -- it  
8 trailed off. I just couldn't hear.  
9 MR. KRY: Was that the correct  
10 recording of your answer, Mr. Coombs?  
11 I think the transcript's  
12 accurate.  
13 MR. DORRIS: Okay.  
14 \*\*\*END FBI CONFIDENTIAL PORTION\*\*\*  
15 QUESTIONS BY MR. KRY:  
16 Q. Mr. Coombs, throughout your  
17 time at Airways Engineering, did you  
18 understand that Omar Al-Bayoumi was pursuing  
19 educational studies in the United States?  
20 A. Yes.  
21 Q. Did you ever tell Dallah Avco  
22 that Al-Bayoumi was doing something other  
23 than pursuing educational studies in the  
24 United States?  
25 A. No.

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1 Q. Did you understand that the  
2 payments that Al-Salmi had arranged for  
3 Al-Bayoumi were intended to fund his  
4 education and living expenses in the United  
5 States?  
6 A. That's what I reasoned to be,  
7 yeah.  
8 Q. Did you ever believe that  
9 Al-Bayoumi was using the payments to fund  
10 terrorism or other criminal activity?  
11 A. No.  
12 Q. Did you ever tell Dallah Avco  
13 that Al-Bayoumi was using the payments to  
14 fund terrorism or other criminal activity?  
15 A. No.  
16 Q. Did you ever tell Dallah Avco  
17 that Al-Bayoumi was using the payments for  
18 anything other than educational and living  
19 expenses?  
20 A. No.  
21 MR. KRY: Great. Why don't we  
22 take a ten-minute break. I suspect  
23 I'm done, but I'll just confer with my  
24 team to see if we have any more  
25 questions.

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1 VIDEOGRAPHER: Off the record  
2 at 2:45 p.m.  
3 (Off the record at 2:45 p.m.)  
4 VIDEOGRAPHER: Back on the  
5 record at 3:02 p.m.  
6 MR. KRY: Mr. Coombs, those are  
7 all the questions we have for you at  
8 this point. Thank you very much for  
9 your time today.  
10 THE WITNESS: You're welcome.  
11 MS. PRITSKER: This is  
12 Gabrielle Pritsker, counsel on behalf  
13 of defendant Dubai Islamic Bank. I  
14 just wanted to make a statement on the  
15 record that DIB counsel was excluded  
16 from the deposition at approximately  
17 3:24 p.m. Eastern Standard Time and  
18 then was brought back into the  
19 deposition after it had already gone  
20 off record on a break. And now we are  
21 back, and Dallah Avco has completed  
22 their questioning.  
23 We ask that moving forward in  
24 all depositions that the videographer  
25 and the court reporter give two or

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1 three seconds for all counsel that are  
2 getting excluded to make a brief  
3 statement before and after the  
4 exclusion.  
5 Thank you.  
6 CROSS-EXAMINATION  
7 QUESTIONS BY MR. POUNIAN:  
8 Q. Mr. Coombs, my name is Steve  
9 Pounian. I'm with the law firm Kreindler &  
10 Kreindler in New York, and we represent --  
11 we're part of the committee that represents  
12 the 9/11 families in this litigation. I just  
13 have a few questions to ask you to follow up  
14 on some of the subjects that have been raised  
15 today.  
16 First, sir, could you just tell  
17 us about your career in the US Army? How  
18 long did you serve -- how long did you serve  
19 in the Army?  
20 A. It was 22 years.  
21 Q. And what rank did you achieve  
22 in the Army, sir?  
23 A. I started when I was a private  
24 in August 1960. I moved up to sergeant, went  
25 to flight school, became a warrant officer,

<p style="text-align: right;">Page 174</p> <p>1 questioning?</p> <p>2 This document is DA99, correct?</p> <p>3 You see the lower right, there's a labeling</p> <p>4 that says DA99?</p> <p>5 A. Yes.</p> <p>6 Q. This was not one of the</p> <p>7 documents shown to you by Kreindler &amp;</p> <p>8 Kreindler, correct?</p> <p>9 A. No.</p> <p>10 Q. You had never seen this</p> <p>11 document before today, correct?</p> <p>12 A. No.</p> <p>13 Q. This was not a document that</p> <p>14 you would have seen in your employment as</p> <p>15 manager of the logistics department, correct?</p> <p>16 A. No, it was -- that's personnel.</p> <p>17 Q. And you had no responsibility</p> <p>18 for paying salaries to Omar Al-Bayoumi,</p> <p>19 correct?</p> <p>20 A. No.</p> <p>21 Q. And you had no knowledge during</p> <p>22 your time at Dallah Avco from 1994 to 1997 of</p> <p>23 whether Omar Al-Bayoumi received any salary</p> <p>24 or not, correct?</p> <p>25 MR. KRY: Objection to the form</p>	<p style="text-align: right;">Page 176</p> <p>1 Hanna, correct?</p> <p>2 A. Yes. Yes.</p> <p>3 Q. Apart from what Magdi Hanna</p> <p>4 told you, you had no knowledge of where Omar</p> <p>5 Al-Bayoumi lived, correct?</p> <p>6 A. No, I did not.</p> <p>7 Q. You were also asked about Magdi</p> <p>8 Hanna's relationship with Omar Al-Bayoumi,</p> <p>9 and I believe you said he was frustrated by</p> <p>10 Bayoumi; is that correct?</p> <p>11 A. He did not like to talk about</p> <p>12 him, and obvious frustration because of the</p> <p>13 requests that were coming to him like for</p> <p>14 furniture and stuff like that and...</p> <p>15 Q. Your understanding of Omar</p> <p>16 Al-Bayoumi's relationship with Magdi Hanna</p> <p>17 came from statements made by Magdi Hanna,</p> <p>18 correct?</p> <p>19 A. Yes.</p> <p>20 Q. It was not something you</p> <p>21 yourself personally experienced -- knew</p> <p>22 about?</p> <p>23 A. No.</p> <p>24 Q. You testified about whether</p> <p>25 Magdi Hanna knew Omar Al-Bayoumi, correct?</p>
<p style="text-align: right;">Page 175</p> <p>1 of the question.</p> <p>2 THE WITNESS: That's correct.</p> <p>3 MR. KRY: Objection. Misstates</p> <p>4 the facts.</p> <p>5 MR. DORRIS: Sure, I'll reask</p> <p>6 it.</p> <p>7 QUESTIONS BY MR. DORRIS:</p> <p>8 Q. And you had no knowledge during</p> <p>9 your time at the logistics department from</p> <p>10 1994 to 1997 of whether Omar Al-Bayoumi</p> <p>11 received any salary or not, correct?</p> <p>12 A. Normal salary? No, I didn't</p> <p>13 know. I just knew about what was coming</p> <p>14 through my office.</p> <p>15 Q. Now, you -- in Mr. Pounian's</p> <p>16 questioning you were asked some questions</p> <p>17 about Magdi Hanna's relationship with Omar</p> <p>18 Al-Bayoumi, correct?</p> <p>19 A. Yeah.</p> <p>20 Q. And all of the statements you</p> <p>21 made were -- the basis for those were things</p> <p>22 that Magdi Hanna told you, correct?</p> <p>23 A. Yeah.</p> <p>24 Q. The statement about where Omar</p> <p>25 Al-Bayoumi lived was told to you by Magdi</p>	<p style="text-align: right;">Page 177</p> <p>1 A. He did know him, yes.</p> <p>2 Q. The only time you saw Magdi</p> <p>3 Hanna and Omar Al-Bayoumi interact was the</p> <p>4 one encounter at Ercan, correct?</p> <p>5 A. Yes.</p> <p>6 Q. And any other information you</p> <p>7 have about a relationship between Magdi Hanna</p> <p>8 and Omar Al-Bayoumi came from Magdi Hanna,</p> <p>9 correct?</p> <p>10 A. That's correct. That's</p> <p>11 correct.</p> <p>12 Q. The only thing you experienced</p> <p>13 yourself was the one encounter, which I think</p> <p>14 you testified was at most ten minutes and</p> <p>15 25 years ago, correct?</p> <p>16 A. Yes.</p> <p>17 MR. DORRIS: Thank you. That's</p> <p>18 all my questions.</p> <p>19 MR. KRY: I just have one or</p> <p>20 two questions.</p> <p>21 RECROSS EXAMINATION</p> <p>22 QUESTIONS BY MR. KRY:</p> <p>23 Q. Mr. Coombs, you testified about</p> <p>24 a Lotus 1-2-3 spreadsheet that you created at</p> <p>25 Airways Engineering to track the educational</p>



<p style="text-align: right;">Page 178</p> <p>1 funding payments to students at the direction 2 of Al-Salmi. 3 Do you remember that testimony? 4 A. Yeah, I -- 5 Q. Did you ever send a copy of 6 that spreadsheet to Dallah Avco? 7 A. No. It was -- it was -- it was 8 what I was doing personally to track things. 9 I could make myself spreadsheets so that when 10 I went to brief about my budget, I could draw 11 it out and everybody was -- this is before we 12 had all the software we have now. 13 Q. And so -- 14 A. But I knew how to build 15 spreadsheets. But I knew how to do it. I 16 knew how to build the spreadsheets and 17 things, and so I did it myself. 18 And then I would -- I would 19 build it and everything so I could brief -- 20 I'd stand up -- they'd ask me to stand up and 21 show my budget and everything else, and then 22 I'd brief it. And then they'd tell me to sit 23 down, and then they'd tell me to leave. 24 Q. Okay. The "they" you're 25 referring to there is Airways Engineering?</p> <p style="text-align: right;">Page 179</p> <p>1 A. Huh? 2 Q. The "they" you were referring 3 to there was Airways Engineering? 4 A. Yeah. Yeah. 5 MR. KRY: I have no further 6 questions. Thank you. 7 MR. POUNIAN: Thank you, 8 Mr. Coombs. 9 VIDEOGRAPHER: This concludes 10 today's deposition. The time is 11 3:35 p.m. We're off the record. 12 (Deposition concluded at 3:35 p.m.) 13 ----- 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 180</p> <p style="text-align: center;">CERTIFICATE</p> <p>1 2 3 I, CARRIE A. CAMPBELL, Registered 4 Diplomat Reporter, Certified Realtime Reporter and Certified Shorthand Reporter, do 5 hereby certify that prior to the commencement of the examination, Samuel G. Coombs, was 6 duly sworn by me to testify to the truth, the whole truth and nothing but the truth. 7 I DO FURTHER CERTIFY that the 8 foregoing is a verbatim transcript of the testimony as taken stenographically by and 9 before me at the time, place and on the date hereinbefore set forth, to the best of my 10 ability. 11 I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney 12 nor counsel of any of the parties to this action, and that I am neither a relative nor 13 employee of such attorney or counsel, and that I am not financially interested in the 14 action. 15 16 17 <u>CARRIE A. CAMPBELL,</u> 18 NCRA Registered Diplomat Reporter Certified Realtime Reporter 19 Notary Public 20 21 22 23 Dated: July 12, 2021 24 25</p> <p style="text-align: right;">Page 181</p> <p style="text-align: center;">INSTRUCTIONS TO WITNESS</p> <p>1 2 3 Please read your deposition over 4 carefully and make any necessary corrections. 5 You should state the reason in the 6 appropriate space on the errata sheet for any 7 corrections that are made. 8 After doing so, please sign the 9 errata sheet and date it. You are signing 10 same subject to the changes you have noted on 11 the errata sheet, which will be attached to 12 your deposition. 13 It is imperative that you return 14 the original errata sheet to the deposing 15 attorney within sixty (60) days of receipt 16 of the deposition transcript by you. If you 17 fail to do so, the deposition transcript may 18 be deemed to be accurate and may be used in 19 court. 20 21 22 23 24 25</p>
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